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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- 13 Affects PG&E Corporation
14 Affects Pacific Gas and Electric Company
15 Affects both Debtors

16 **All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**JOINDER IN THE SUPPLEMENT TO
THE APPLICATIONS OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS PURSUANT TO 11 U.S.C.
§ 1103 AND FED. R. BANKR. P. 2014
AND 5002 TO RETAIN AND EMPLOY
HON. JOHN K. TROTTER (RET.) AS
TRUSTEE AND CATHY YANNI AS
ADMINISTRATOR *NUNC PRO TUNC*
TO JANUARY 13, 2020 THROUGH THE
EFFECTIVE DATE OF THE
RESOLUTION TRUST AGREEMENT
(Relates to Dkt. No. 6746)**

18 Date: April 14, 2020
19 Time: 10:00 a.m. (Pacific Time)
20 Place: **Telephonic Appearances Only**
Objection Deadline: Passed

21 Claimant Tommy Wehe, by and though undersigned counsel, respectfully joins in the
22 Supplement to the Applications of the Official Committee of Tort Claimants Pursuant to 11 U.S.C.
23 § 1103 and Fed. R. Bankr. P. 2014 and 5002 to Retain and Employ Hon. John K. Trotter (Ret.) as
24 Trustee and Cathy Yanni as Administrator *Nunc Pro Tunc* to January 13, 2020 Through the
25 Effective Date of the Resolution Trust Agreement (the “**Supplement**”) (Dkt. No. 6746).

26 On August 14, 2019, Counsel for PG&E said, “we all understand the reason we’re here is
27 because of the tragic 2017 and 2018 wildfires. We know that entire towns were destroyed, people’s
28 lives were changed forever. We can’t lose sight of that. And the reason we’re in this bankruptcy

1 court is to try to **find the quickest and most efficient way to provide compensation to those**
2 **wildfire victims who are entitled to compensation. And we made clear from the first day of**
3 **these cases that that's what we want to do.** We had made tremendous efforts, between the filing
4 and today, to try to resolve these, because I think all of us, the Court included, would love for this
5 to be resolved consensually. (8/14 Hearing Transcript pp.22:18-23:6)

6 As discussed many times in this Court, there are four contact points between the fire victims
7 and this bankruptcy case: (1) inclusion—proof of claims; (2) estimation—aggregate value of
8 claims; (3) informed consent requirements as they relate to voting; and (4) allocation and
9 distribution. Each of these relate to the other and should be considered as a whole. As counsel for
10 PG&E stated, a goal of this case is to provide quick and efficient compensation to the fire victims.
11 The allocation process in this case is going to be an enormous undertaking. By comparison, the
12 efforts undertaking relating to estimation, which are general, pale in comparison to the realities
13 involved in evaluating real individual cases and their damage categories under California law.
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15 Counsel will be available to answer any questions the Court may have regarding the claims
16 administration process, the relationship between this process and the informed consent process, and
17 the efforts of BrownGreer and the proposed Trustee and Claims Administrator to put together an
18 allocation process based upon the Court's order of September 17, 2019 (Doc 3922), and in the
19 future. For the reasons set forth at length in the Supplement, including the Declaration of Philip
20 Strunk in support of the Supplement, Mr. Wehe agrees that there is a crucial need for the TCC to
21 retain Justice Trotter as trustee and Ms. Yanni as claims administrator of the resolution trust, and
22 that they be provided with the funds necessary to ensure that the claims processing mechanisms are
23 operational as of the effective date of the plan of reorganization. This is necessary to ensure that
24 there is no further delay to the fire victims in receiving their distributions.
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1 Accordingly, Mr. Wehe respectfully requests that the Court approve the retentions of Justice
2 Trotter and Ms. Yanni and approve the budget provided for in the Supplement.
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4 Dated: April 13, 2020
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6 By: /s/ Steven J. Skikos

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